

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS

SHABBIR HASSAN,

Plaintiff,

v.

SEQUIUM ASSET SOLUTIONS, LLC,

Defendant.

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CASE NO. 1:21-cv-02311

NOTICE OF REMOVAL

DEFENDANT SEQUIUM ASSET SOLUTIONS, LLC'S
NOTICE OF REMOVAL

TO THE HONORABLE JUDGE OF SAID COURT:

COMES NOW, Defendant SEQUIUM ASSET SOLUTIONS, LLC ("SAS"), by and through its undersigned counsel, and files its *Notice of Removal* as follows:

1. Plaintiff SHABBIR HASSAN ("Plaintiff") filed his state court Complaint on March 25, 2021 in the Circuit Court of Cook County, Illinois, Municipal Department, First District.
2. This is a civil action based on Plaintiff's contention that SAS violated the Fair Debt Collection Practices Act, 15 U.S.C. § 1692 *et seq.* ("FDCPA"). This case is still pending in state court.
3. Removal is proper because this case involves a federal question—an alleged violation of the Fair Debt Collection Practices Act. This entire suit is removable under 28 U.S.C. § 1441(a).
4. Venue is proper in this district under 28 U.S.C. 1441(a) because the state court where the suit has been pending is in this district.

5. Removal is timely pursuant to 28 U.S.C. § 1441(b) because SAS has filed its *Notice of Removal* within 30 days of receipt of Plaintiffs' state-court Petition which was served on March 30, 2021.

6. Pursuant to U.S.C. § 1441(a), a copy of all process, pleadings, documents, and orders in this case have been attached as **Exhibit A**.

7. A copy of this *Notice of Removal* has been sent to Plaintiff and will be filed with the Clerk of the Circuit Court of Cook County, Illinois, Municipal Department, First District.

8. Plaintiff did not request a jury trial in the state court matter.

WHEREFORE, SAS respectfully requests that this Court assume full jurisdiction over the proceeding as provided by law.

Dated: April 29, 2021

Respectfully submitted,

MALONE FROST MARTIN PLLC

s/ PATRICK A. WATTS

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COUNSEL FOR DEFENDANT

SEQUIUM ASSET SOLUTIONS, LLC

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served via the Court's ECF filing system and via electronic mail pursuant to 28 U.S.C. §1446(d), on this 29th day of April, 2021, to:

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By: /s/ Patrick A. Watts